

GOLDSTEIN & RUSSELL, P.C.

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September 15, 2020

**Via CM/ECF**

Hon. Lorna G. Schofield  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: 20-cv-4322-LGS, *King v. Habib Bank Limited*, Request for Adjournment of  
Initial Case Management Conference

Dear Judge Schofield,

I represent the plaintiffs in this action and write to respectfully move, pursuant to your honor's Individual Rule of Practice I.B.2, for a renewed adjournment of the initial case management conference currently scheduled for September 24, 2020, at 10:50 AM. This is the second request for adjournment (the conference was initially scheduled for August 13, 2020, and the Court granted my first request for an adjournment on August 6). A further adjournment is warranted because, for reasons beyond our control, we still have not been able to complete service or reach defense counsel.

As I advised in my letter dated August 5, 2020, we are pursuing service through the Hague Convention on the Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters. The complaint and summons have been delivered to Pakistan's central authority, and the process is now completely out of our hands. We are hopeful that the request will be processed soon (as it has now been with the central authority for two months), but we do not know how long it will take.

At this time, we still do not know who defendant intends to retain as defense counsel, and have had no contact with any attorneys claiming to represent defendant. We also have been unable to prepare the joint pre-conference written materials because we do not know what defenses defendant intends to raise.

For the foregoing reasons, I respectfully request that the initial case management conference be adjourned until service is completed or contact with defendant's

Judge Schofield  
Page 2 of 2

counsel has been made, at which point I will promptly advise the Court of the status of the case and request a new initial case management conference date. If the Court prefers to adjourn to a date certain, we are happy to work with whatever date the Court thinks appropriate.

Respectfully submitted,


s/Tejinder Singh

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Application GRANTED. The initial pretrial conference scheduled for September 24, 2020, is **adjourned sine die**. Plaintiffs shall file a status letter on service and communication efforts by **October 16, 2020**, and every 30 days thereafter. If service is completed or Plaintiff is in communication with Defendant in between status letter deadlines, Plaintiff shall file a status letter within two business days of the event.

So Ordered.

Dated: September 16, 2020  
New York, New York

A handwritten signature in black ink, appearing to read 'L. G. Schofield', written over a horizontal line.

**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**